IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

D.H., a minor, by her next friends A.H., mother, and E.H., father,

Plaintiff,

Case No. 3:22-cv-00570

v.

WILLIAMSON COUNTY BOARD OF EDUCATION, et al.,

Defendants.

District Judge William L. Campbell, Jr. Magistrate Judge Jeffrey S. Frensley

JOINT MOTION FOR ENTRY OF |PROPOSED| PROTECTIVE ORDER

The parties hereby jointly move the Court to enter the parties' [Proposed] Protective Order, attached as **Exhibit A** hereto.

Dated: March 4, 2024 /s/ Tricia R. Herzfeld

Tricia R. Herzfeld (#26014)

HERZFELD SUETHOLZ GASTEL LENISKI AND WALL, PLLC

223 Rosa L. Parks Avenue, Suite 300 Nashville, TN 37203 Telephone: (615) 800-6225 tricia@hsglawgroup.com

Adam S. Lurie*
Rebecca Zeldin*
Jarrett Field*
LINKLATERS LLP
1290 Avenue of the Americas
New York, NY 10104
T: (212) 903-9000
F: (212) 903-9100
adam.lurie@linklaters.com
rebecca.zeldin@linklaters.com
jarrett.field@linklaters.com

Jason Starr*

Ami Rakesh Patel* HUMAN RIGHTS CAMPAIGN FOUNDATION 1640 Rhode Island Avenue NW Washington, D.C. 20036 T: (202) 628-4160 F: (202) 628-0517 Jason.starr@hrc.org Jason.Starr@hrc.org

* Admitted pro hac vice

Attorneys for Plaintiff D.H., a minor, by her next friends A.H., mother, and E.H., father

By: /s/ Lisa M. Carson Lisa M. Carson Courtney M. King BUERGER, MOSELEY & CARSON, PLC 4068 Rural Plains Circle Franklin, TN 37064 T: (615) 794-8850 F: (615) 790-8861 cking@buergerlaw.com lcarson@buergerlaw.com

Attorneys for Defendants Williamson County Board of Education

By: /s/ Jeffrey B. Cadle

James Matthew Rice, Associate Solicitor General & Special Assistant to the Solicitor General Gabriel Joseph Krimm, Assistant Solicitor General Jeffrey B. Cadle, Assistant Attorney General Shanell L. Tyler, Assistant Attorney General Office of the Attorney General and Reporter P.O. Box 20207 Nashville, TN 37202 T: (615) 532-6026 F: (615) 741-2009

Gabriel.Krimm@ag.tn.gov Matt.Rice@ag.tn.gov Jeffrey.Cadle@ag.tn.gov Shanell.Tyler@ag.tn.gov

Attorneys for Defendants, Lizzette Gonzalez Reynolds, in her official capacity as Commissioner of the Tennessee Department of Education, and the Tennessee Department of Education

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via electronic mail on this 4th day of March, 2024 and by the Court's CM/ECF system which electronically served a copy to all counsel of record:

Courtney M. King

Buerger, Moseley & Carson, PLC 306 Public Square Franklin, TN 37064 cking@buergerlaw.com

Lisa M. Carson

Buerger, Moseley & Carson, PLC 306 Public Square Franklin, TN 37064 lcarson@buergerlaw.com

Attorneys for Williamson County Board of Education and Jason Golden

Gabriel Krimm J. Matthew Rice Shanell L. Tyler Jeffrey B. Cadle

Office of the Attorney General and Reporter P.O. Box 20207

Nashville, Tennessee 37202-0207 Gabriel.krimm@ag.tn.gov Matt.rice@tn.ag.gov Shanell.tyler@ag.tn.gov Jeffrey.cadle@ag.tn.gov

Attorneys for the Tennessee Department of **Education and its Commissioner**

> /s/ Tricia R. Herzfeld Tricia R. Herzfeld